UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

REAL SELLING GROUP, LLC

Civil Action No. 1:20-cv-01468-NRB

Plaintiff,

v.

ESN GROUP, INC.,

Defendant.

STIPULATION AND [PROPOSED] ORDER SETTING BRIEFING SCHEDULE ON DEFENDANT'S MOTION TO DISMISS

Plaintiff Real Selling Group, LLL ("Plaintiff") and Defendant ESN Group, Inc.

("Defendant") jointly the "Parties"), by and through their respective counsel, stipulate as follows

WHEREAS, the Parties participated in a pre-motion telephonic conference with the Court on June 16, 2020 regarding Defendant's request to file a motion to dismiss for lack of personal jurisdiction;

WHEREAS, during the telephonic conference the Court brought to the Parties' attention a prior authority on the issues raised by the proposed motion and directed that the Parties should provide the Court with a proposed briefing schedule if the Parties determined to proceed with the motion after consideration of the cited authority;

WHEREAS, the Parties have conferred and have reached agreement on a proposed schedule for briefing on Defendant's motion to dismiss for submission to the Court;

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that:

1. Defendant's moving papers in support of its motion to dismiss shall be filed on or before August 11, 2020.

- 2. Plaintiff's memorandum of law in opposition to Defendant's motion to dismiss shall be filed on or before September 11, 2020.
- 3. Defendant's reply memorandum of law in further support of its motion to dismiss shall be filed on or before September 22, 2020.

Dated: July 23, 2020 Respectfully Submitted,

Signature: /s/Stephen E. Paffrath
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Dated: July 23, 2020 <u>Signature: /s/ Adam E. Engel</u>

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IT IS SO ORDERED.

DATED: ___ July 27, 2020

Hon. Naomi Reice Buchwald